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The County of Sonoma

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

DAVID TAYLOR,
Plaintiff,

v.

COUNTY OF SONOMA, and DOES 1
through 50, inclusive,
Defendants.

No. CV-09-2841 THE

STIPULATION TO FILE AMENDED
COMPLAINT, EXTEND TIME TO FILE
RESPONSE, AND MODIFY ORDER
SETTING INITIAL CASE
MANAGEMENT CONFERENCE
DEADLINES; ~~PROPOSED~~ ORDER

The parties to this action hereby agree and stipulate, and request the Court to enter an order for good cause, as follows.

RECITALS

A. Plaintiff David Taylor ("Plaintiff") filed his Complaint for Damages in this action on June 25, 2009, and served it on Defendant the County of Sonoma ("Defendant") via a Notice of Lawsuit and Request for Waiver of Service of Summons served on July 23, 2009.

B. Pursuant to the Rules of Federal Procedure, Rule 12(a)(1)(A)(ii), Defendant's response to the Complaint is due to be filed on September 21, 2009.

C. Upon the filing of this action, this Court entered its Order Setting Initial Case Management Conference and ADR Deadlines (the "CMC Order"), setting certain dates

1 herein, including the filing of the Rule 26(f) report due on September 28, 2009, and the initial
2 case management conference to be held on October 5, 2009.

3 D. Defendant has provided information and discovery to Plaintiff in connection
4 with Defendant's Initial Disclosures, served on September 15, 2009, which demonstrate that
5 certain factual allegations made in the Complaint are incorrect.

6 E. Counsel for the parties have engaged in discussions to determine how best to
7 proceed in this case in the most efficient and effective manner, and require additional time to
8 review and discuss the relevant issues than allotted under the Federal Rules of Civil
9 Procedure and this Court's CMC Order.

10 F. To obviate the need for filing multiple stipulations and requests for extension
11 of time herein, the parties agree to request the Court to modify the current deadlines as set
12 forth below.

13 STIPULATION

- 14 1. Plaintiff may file an amended complaint in this action no later than **October**
15 **19, 2009**, unless otherwise specifically authorized by the Court.
- 16 2. Defendant's response to the initial complaint, or any amended complaint filed
17 herein, shall be filed no later than **November 2, 2009**.
- 18 3. The last day to file the Rule 26(f) Report, complete initial disclosures or state
19 objection in Rule 26(f) Report, and file Case Management Statement shall be
20 **November 9, 2009**.
- 21 4. The Initial Case Management Conference (CMC) shall be held on **November**
22 **16, 2009**, in Courtroom 12, 19th Floor, at 1:30 p.m.

23 IT IS SO STIPULATED.

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1 Dated: September 21, 2009

STEVEN M. WOODSIDE, County Counsel

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3 By: /s/ Anne L. Keck
ANNE L. KECK
Deputy County Counsel
Attorneys for Defendant
The County of Sonoma

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6 Dated: September 21, 2009

TEAL, MONTGOMERY & HENDERSON

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8 By: /s/ Steven P. Reiner
Steven P. Reiner
Attorneys for Plaintiff
David Taylor

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12 **ORDER**

13 PURSUANT TO THE FOREGOING STIPULATION, IT IS SO ORDERED.

14 Date: 09/22/09

15 Honorable Thelton E. Henderson
United States District Court Judge

